

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20054

RECEIVED

SEP - 2 1997

In Re:)
)
Amendment of Section 73.202(b))
Table of Allotments) MM Docket No. 97-156
FM Broadcast Stations)
(Greenwood and Abbeville, SC))

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Sharon P. McDonald
Allocations Branch

COMMENT OF PETITIONER

Petitioner Sutton Radiocasting Corp. ("Sutton"), ^{1/} hereby submits this Comment in response to the FCC's Notice of Proposed Rule Making, RM-9110, DA 97-1421, released July 11, 1997.

Sutton restates its intention to apply for and, if authorized, promptly to build the requested new FM station on Channel 244C3 at Abbeville, SC. Sutton also hereby incorporates by reference its Petition, filed May 19, 1997.

As requested in the NPRM (para. 3), Sutton attaches hereto an engineering study reflecting the "gain and loss areas" that would result from the reallocation of Channel 244C3 to Abbeville.

Sutton also submits, in response to the NPRM, supra, the following information demonstrating the overall public interest benefits that would be derived from the proposed reallocation of Channel 244C3 to Abbeville.

^{1/} On June 30, 1997, the FCC gave public notice of its grant of Greenwood Broadcasting Co., Inc.'s Form 316 application to assign the license of WCRS-FM to Sutton Radiocasting Corp. (BALH-970616GI). Petitioner is now Sutton Radiocasting Corp.

1. The reallocation would provide Abbeville with its first competing, local FM transmission service. ^{2/}

2. The reallocation would enable existing station WCRS-FM nearly to double its 60dBu service area in an area of central South Carolina where the growth of new radio services has not been great.

3. The reallocation would enable WCRS-FM to provide Abbeville with extensive local news and weather coverage from the first full-time local radio news department. The public will greatly benefit from local radio news coverage of city and county governmental meetings, local radio broadcast of law enforcement information and local broadcast of various other public service information that is possible only through a radio station that maintains a full-time local news operation.

4. The reallocation also would enable WCRS-FM to provide an hourly "community bulletin board" service, which will highlight social, cultural and political events in Abbeville. With an increase to 25,000 watts, WCRS-FM can become an "electronic billboard" for the Abbeville community, promoting that community's attributes and helping to address its needs throughout a broad area of western South Carolina and northeast Georgia.

5. The reallocation also would enable WCRS-FM to provide free airtime for Abbeville civic groups and non-profit organizations to promote their community interests and activities.

^{2/} Station WZLA (FM) is currently the only FM facility licensed to Abbeville.

6. The reallocation also would enable WCRS-FM to provide the only live coverage of Abbeville elections, as well as the broadcast of more detailed local political campaign coverage.

7. The reallocation also would enable WCRS-FM to provide the listeners of Abbeville and surrounding areas with a toll-free "listener line," in order to obtain constant input and ideas from station listeners.

In short, the proposed reallocation would enable one of the region's most honored radio stations to reach even greater heights in public service to an even broader audience. ^{3/}

Respectfully submitted,



Robert Lewis Thompson
TAYLOR THIEMANN & AITKEN, LC
908 King Street, Suite 300
Alexandria, VA 22314
(703) 836-9400

Counsel for Petitioner,
Sutton Radiocasting Corp.

September 2, 1997

^{3/} The licensee of WCRS-FM has been recognized as Station of the Year by the South Carolina Broadcasters Association. It has received such prestigious citations as the "NAB Crystal Award" and Radio Ink Magazine's "General Manager of the Year" award.

**ENGINEERING STATEMENT
IN SUPPORT OF
COMMENTS TO NOTICE OF
PROPOSED RULE MAKING**

August 28, 1997

Sutton Radiocasting Corporation
Radio Station WCRS-FM
FM Channel 244C3 □ 96.7 Megahertz
Abbeville, South Carolina
MM Docket No. 97-156



LAWRENCE L. MORTON ASSOCIATES
1231 MESA OAKS LANE
MESA OAKS, CALIFORNIA 93436-2309
(805) 733-4275 / FAX (805) 733-4793

TABLE OF CONTENTS

EXHIBIT	DOCUMENT DESCRIPTION
E-1	Engineering Statement and Affidavit
E-2	Map Showing Comparison Between WCRS-FM Licensed Class A Service Contour at Greenwood and Proposed Class C3 Service Contour at Abbeville
E-3	Map Showing WCRS-FM Contour at Greenwood and Contours of Other Aural Broadcast Services
E-4	Map Showing WCRS-FM Contour at Abbeville and Contours of Other Aural Broadcast Services
E-5	Maps Showing Areas That Receive Service From Other Aural Broadcast Services Within WCRS-FM Proposed Loss Area at Greenwood
E-6	Maps Showing Areas That Receive Service From Other Aural Broadcast Services Within WCRS-FM Proposed Gain Area at Abbeville
E-7	Tabulation of Aural Broadcast Services Within Proposed Loss Area
E-8	Tabulation of Aural Broadcast Services Within Proposed Gain Area
E-9	Tabulation of AM and FM Broadcast Stations Providing Aural Services Within Proposed Loss Area
E-10	Tabulation of AM and FM Broadcast Stations Providing Aural Services Within Proposed Gain Area
E-11	Map Showing Distribution of 1990 U.S. Census Blocks Within Greenwood, Abbeville and Surrounding Area

EXHIBIT E-1 ENGINEERING STATEMENT

The information and data contained within these engineering exhibits were prepared on behalf of Sutton Radiocasting Corporation, licensee of FM broadcast station WCRS-FM, Channel 244A, FCC File No. BLH-920109KC, in support of comments to *Notice of Proposed Rule Making*, MM Docket No. 97-156, released July 11, 1997.

I. DISCUSSION

In Paragraph Three of the *Notice*, the Commission requested additional information from the petitioner concerning existing aural broadcast services within the proposed gain and loss areas. This report serves to address these issues and provide the requested information.

Exhibit E-2 is a map showing the WCRS-FM licensed 60 dB μ service contour at Greenwood and the 60 dB μ contour from a hypothetical Class C3 facility at the fully-spaced proposed allotment reference site for Abbeville.

For each FM station presented in these exhibits, terrain elevation data from three to sixteen kilometers on radials spaced at one-degree azimuthal intervals, starting with True North, were extracted from the computerized thirty-second point elevation database version of *Elevation Data for North America*, available from the Department of Commerce, National Geophysical Data Center, National Oceanic and Atmospheric Administration. A total of 161 points along each radial were linearly interpolated according to § 73.312(d).

The height above average terrain along each of the 360 radials was computed by averaging the elevations between three and sixteen kilometers below the antenna radiation center in accordance with § 73.313(d)(3).

The locations of the 60 dB μ F(50,50) service contours were calculated according to the computer methods outlined in F.C.C. publication PB-249144, *Field Strength Calculations for TV And FM Broadcasting*. These computer methods use digitized data taken directly from the graph of § 73.333 Figure 1. Intermediate values are obtained using bivariate interpolation techniques for surface fitting.

II. LOSS AREA

A study was conducted to determine the number of AM and FM stations that provide full-time aural broadcast service to the area contained within the WCRS-FM 60 dB μ service contour at Greenwood. Exhibits E-2 and E-3 show in red the portion of the WCRS-FM service contour at Greenwood that will become loss area by adoption of the proposed principal community change.

Pursuant to established Commission policy, full-time AM reception service is defined by the station's nighttime interference-free contour for non-Class A stations, and by the 0.5 mV/m groundwave contour for Class A stations. Nighttime interference studies were performed for all full-time AM facilities within the vicinity of the WCRS-FM 60 dB μ contour to determine those AM stations that provide nighttime interference-free service to the area.

Also studied were the 60 dB μ contours of all FM stations in the area to determine those that provide some overlap to the loss area within the WCRS-FM contour at Greenwood. For non-Class C FM stations operating at less than maximum facilities, technical parameters were based on maximum facilities for the class of station under study. In the case of Class C stations, either the actual operating parameters or a minimum 300-meter height above average terrain and 100-kW effective radiated power was assumed, whichever is greater. Exhibit E-9 is a tabulation of the stations that provide aural broadcast reception within the proposed loss area of the WCRS-FM facility at Greenwood.

Exhibit E-3 shows the WCRS-FM service contour from the Greenwood facility, and the service contours of the AM and FM stations that provide aural service within the proposed loss area. Exhibits E-5A through E-5E are a series of "spaghetti" maps showing the proposed loss area and the service contours of the existing aural service providers within the loss area. Blue shading is used to represent the areas that receive a specific number of aural broadcast services corresponding to the number indicated in the title block of the map. Exhibit E-7 tabulates these data and indicates the land areas and populations within the identified loss regions.

The results of this study indicate that the proposed change in principal community will not create any white or gray areas. In fact, *every person residing within the proposed loss area will continue to receive at least three fulltime aural reception services and 93.7 percent of the population will continue to receive five or more aural services.*

III. GAIN AREA

The same type of study was performed to determine the number of existing aural broadcast reception services within the WCRS-FM proposed gain area at Abbeville. Exhibit E-4 shows the WCRS-FM service contour at Abbeville and the service contours of the other aural service providers. The list of contributing stations is tabulated in exhibit E-10.

Exhibits E-6A through E-6E are maps showing the regions within the WCRS-FM service contour gain area at Abbeville that already receive from three to seven-plus fulltime aural reception services. Again, each level of service is shaded in blue and corresponds to the number of services shown in the title block.

The proposed WCRS-FM facility at Abbeville *will result in a fourth service to 1,338 persons, a fifth service to 2,433 persons, a sixth service to 5,502 persons and a seventh service to 5,987 persons.* These data are tabulated in Exhibit E-8.

Exhibit E-11 depicts in blue the locations of the 1990 U.S. Census block centroids within the proposed gain and loss areas.

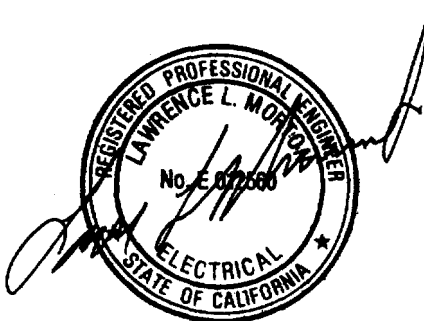
IV. CONCLUSIONS

In conclusion, the following salient facts result from the outcome of the aforementioned analysis, and information provided by the petitioner in its original filing.

- The proposed loss area will be left with no fewer than three aural reception services, and 93.7 percent of the loss area will still be served by five or more fulltime stations.
- Establishment of Channel 244C3 at Abbeville will provide the community with its second local aural broadcast service.
- No other commercial FM channel is available for allotment at Abbeville as an alternative to Channel 244C3.
- Allotment of Channel 244C3 at Abbeville will result in a fourth service to 1,338 persons, a fifth service to 2,433 persons, a sixth service to 5,502 persons and a seventh service to 5,987 persons.

The petitioner reaffirms its intention to apply for Channel 244C3 at Abbeville if it is allotted and, if authorized, to build the requested facility promptly.

Lawrence L. Morton, P.E.
Consulting Engineer to Sutton Radiocasting Corporation
August 28, 1997



AFFIDAVIT

State of California)
)
County of Orange) ss:

Lawrence L. Morton, being first duly sworn upon oath, deposes and says:

- That he is a qualified engineer,
- That he is a Registered Professional Engineer in the State of California,
- That he is a member of the Association of Federal Communications Consulting Engineers,
- That his qualifications are a matter of record with the Federal Communications Commission,
- That he has prepared many broadcast applications and engineering exhibits that have been filed with and granted by the Federal Communications Commission,
- That he has carried out such engineering work and that the results thereof are attached hereto and form part of this affidavit, and
- That the foregoing statement and the report regarding the aforementioned engineering work are true and correct of his own knowledge.

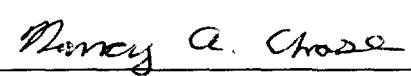
Date: August 28, 1997



Lawrence L. Morton, P.E.

On August 28, 1997, before me, Nancy A. Chase, a Notary Public, in and for the State of California, personally appeared Lawrence L. Morton known to me to be the person whose name is subscribed to the within instrument, and acknowledged to me that he executed the same.

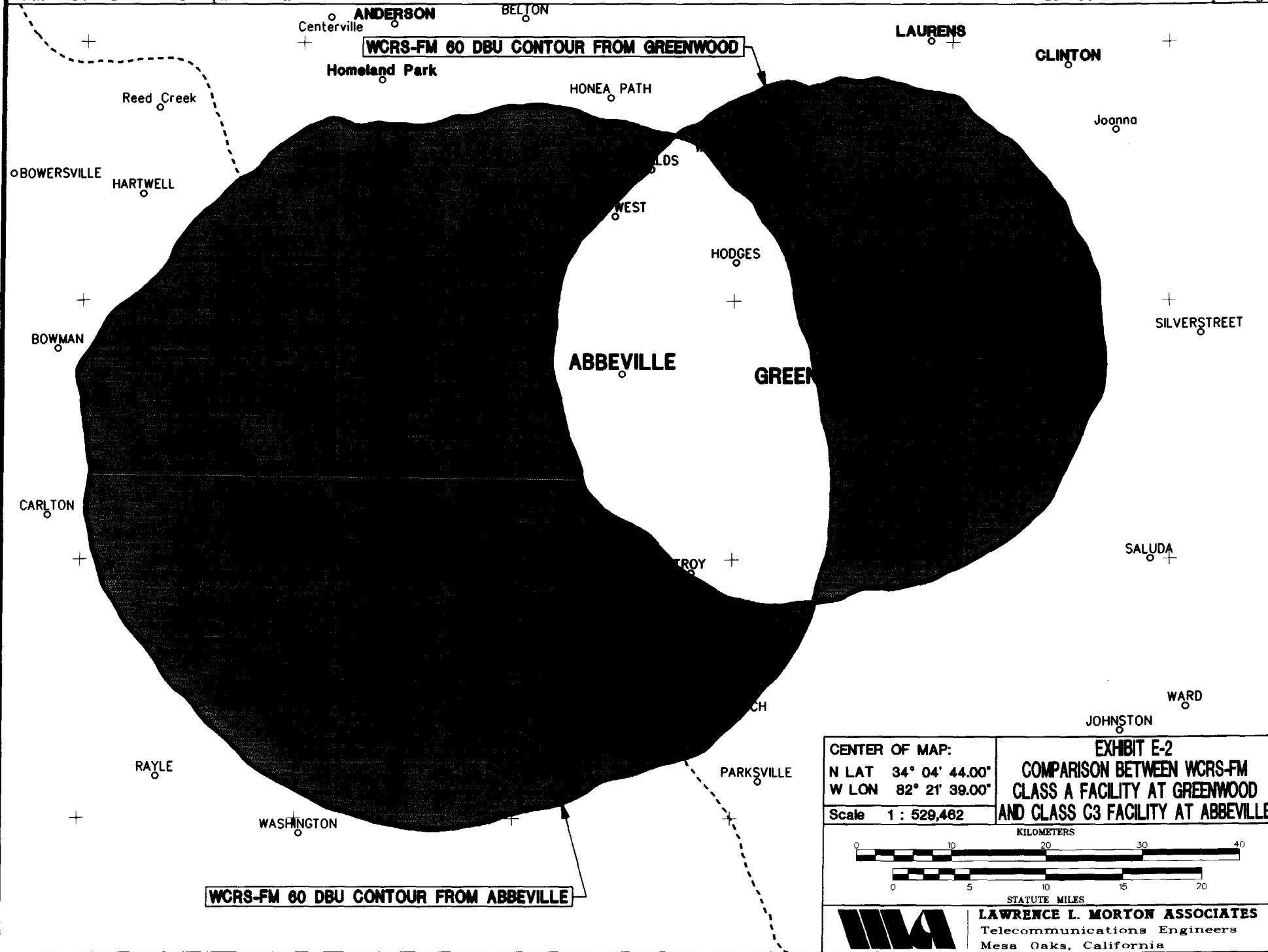
My Commission expires 11/30/99



Notary Public

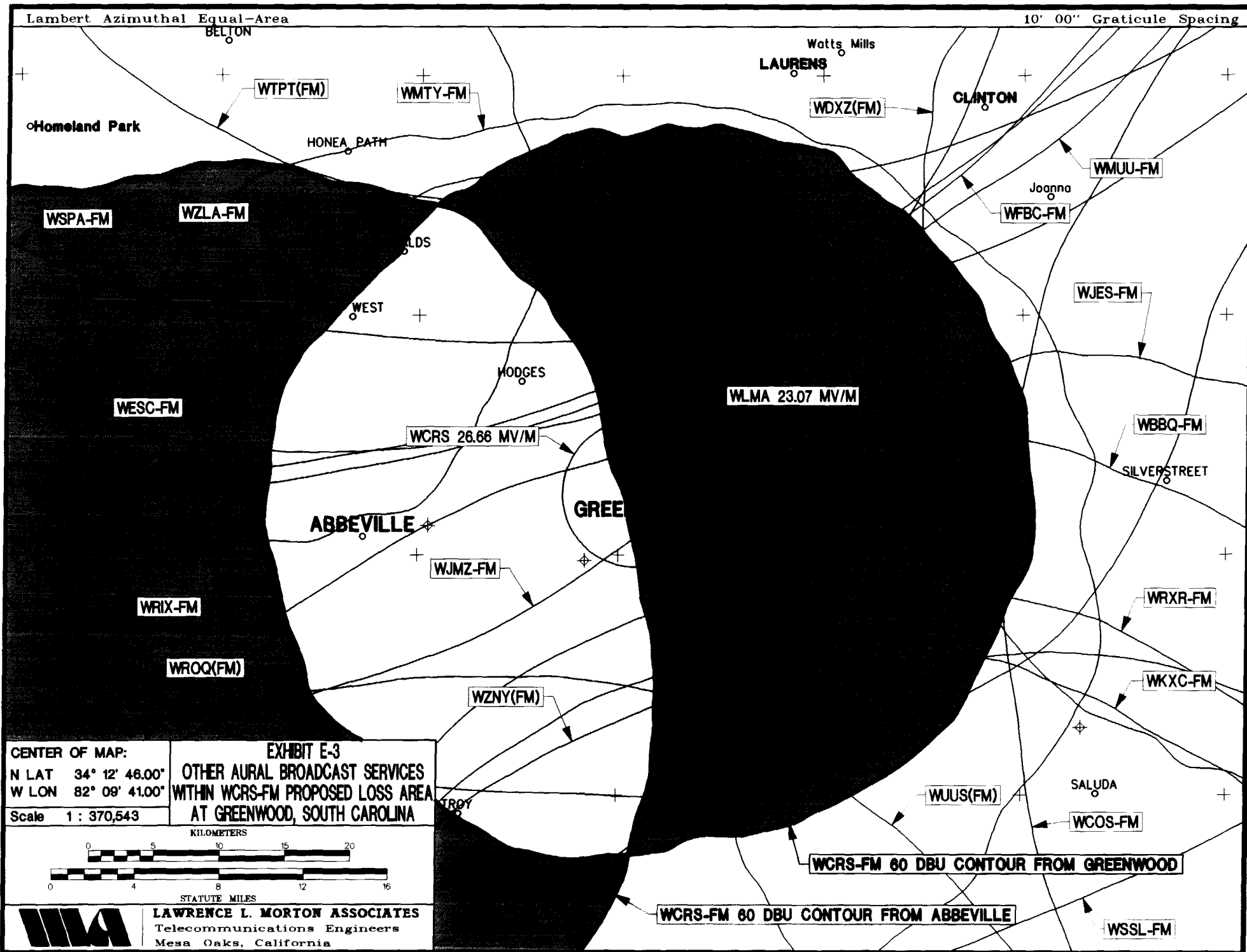


15' 00" Graticule Spacing



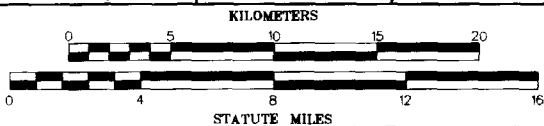
Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing



CENTER OF MAP:
N LAT 34° 12' 46.00"
W LON 82° 09' 41.00"
Scale 1 : 370,543

EXHIBIT E-3
OTHER AURAL BROADCAST SERVICES
WITHIN WCRS-FM PROPOSED LOSS AREA
AT GREENWOOD, SOUTH CAROLINA



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing

CENTER OF MAP:

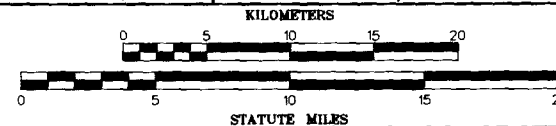
N LAT 34° 05' 23.00"

W LON 82° 28' 19.00"

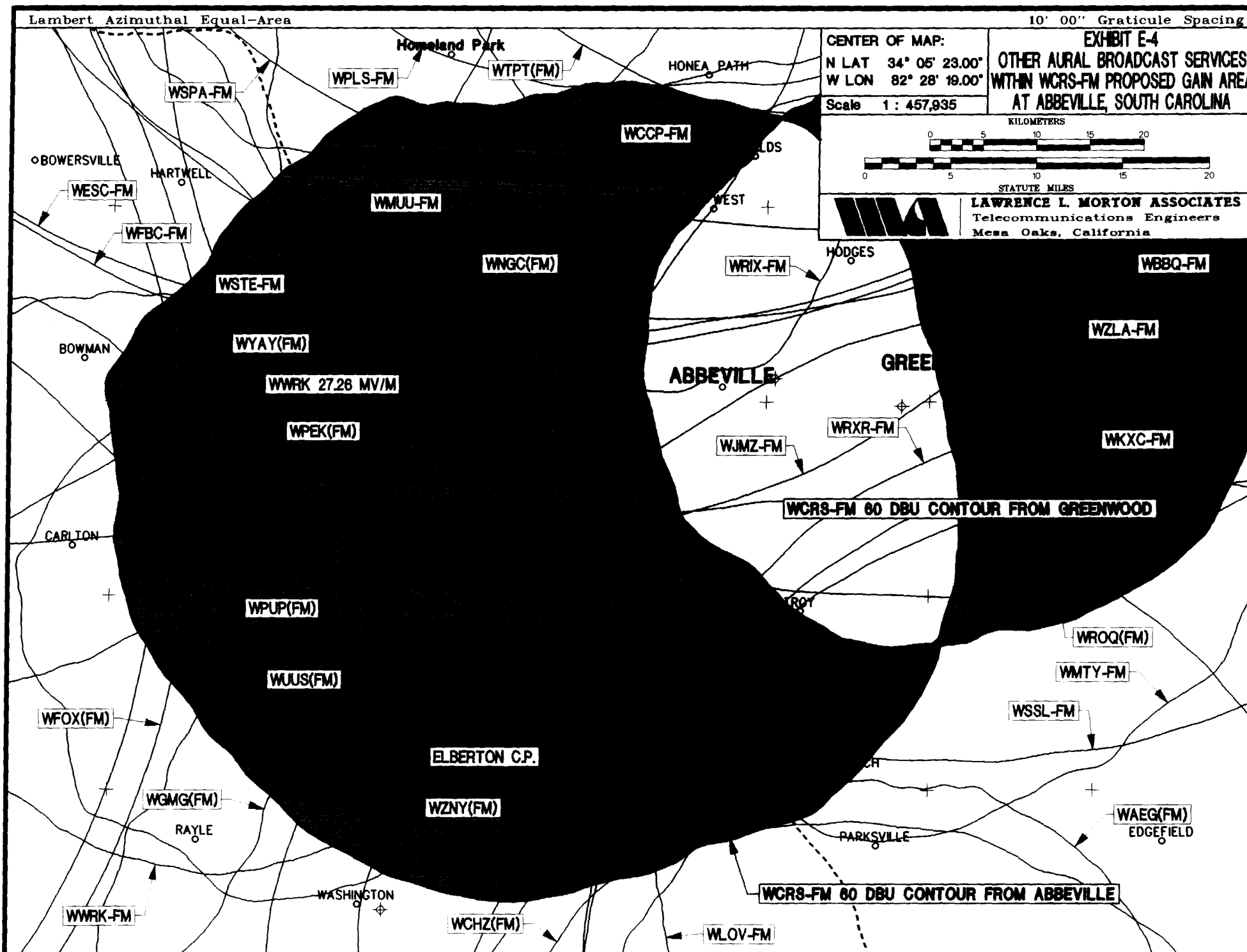
Scale 1 : 457,935

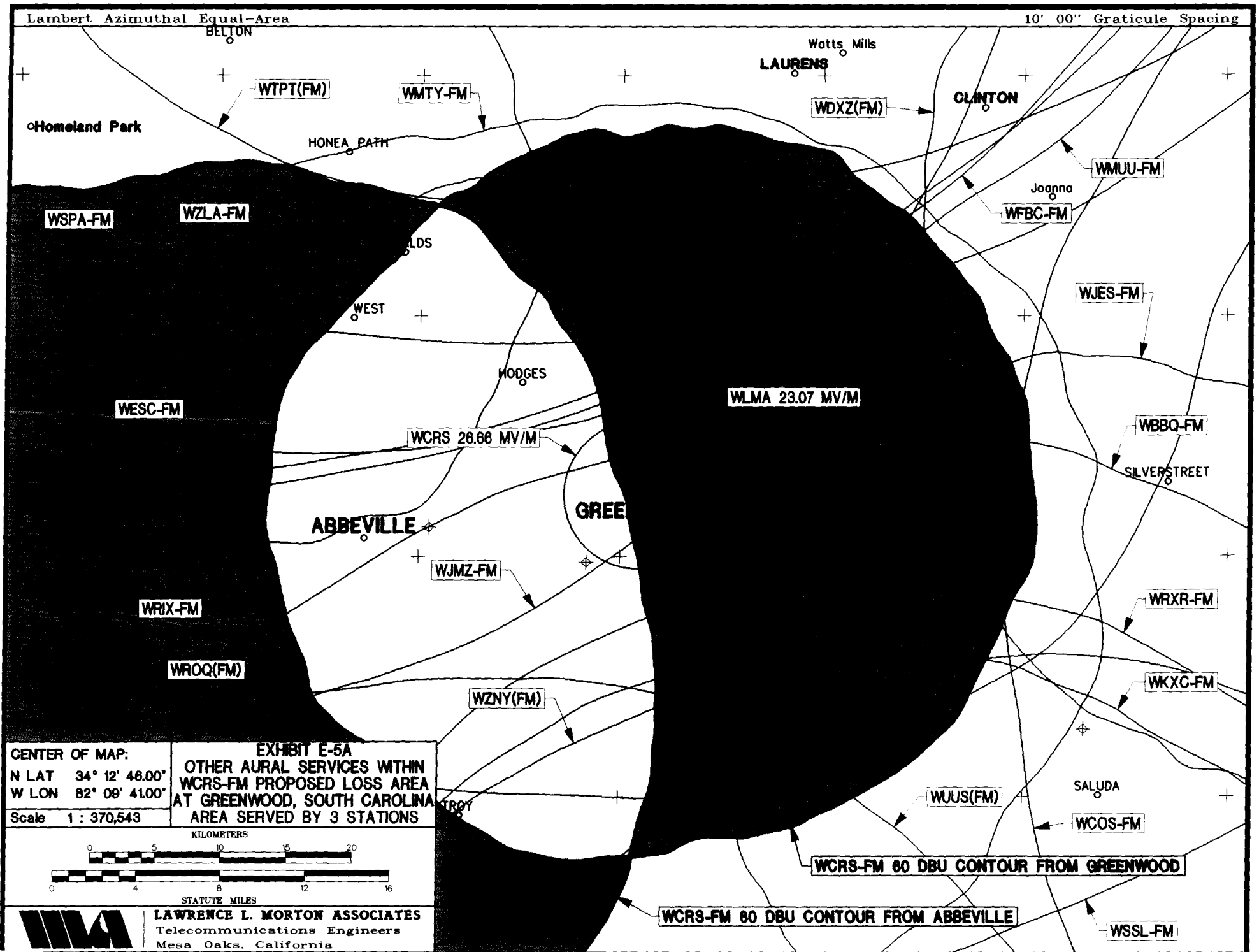
EXHIBIT E-4

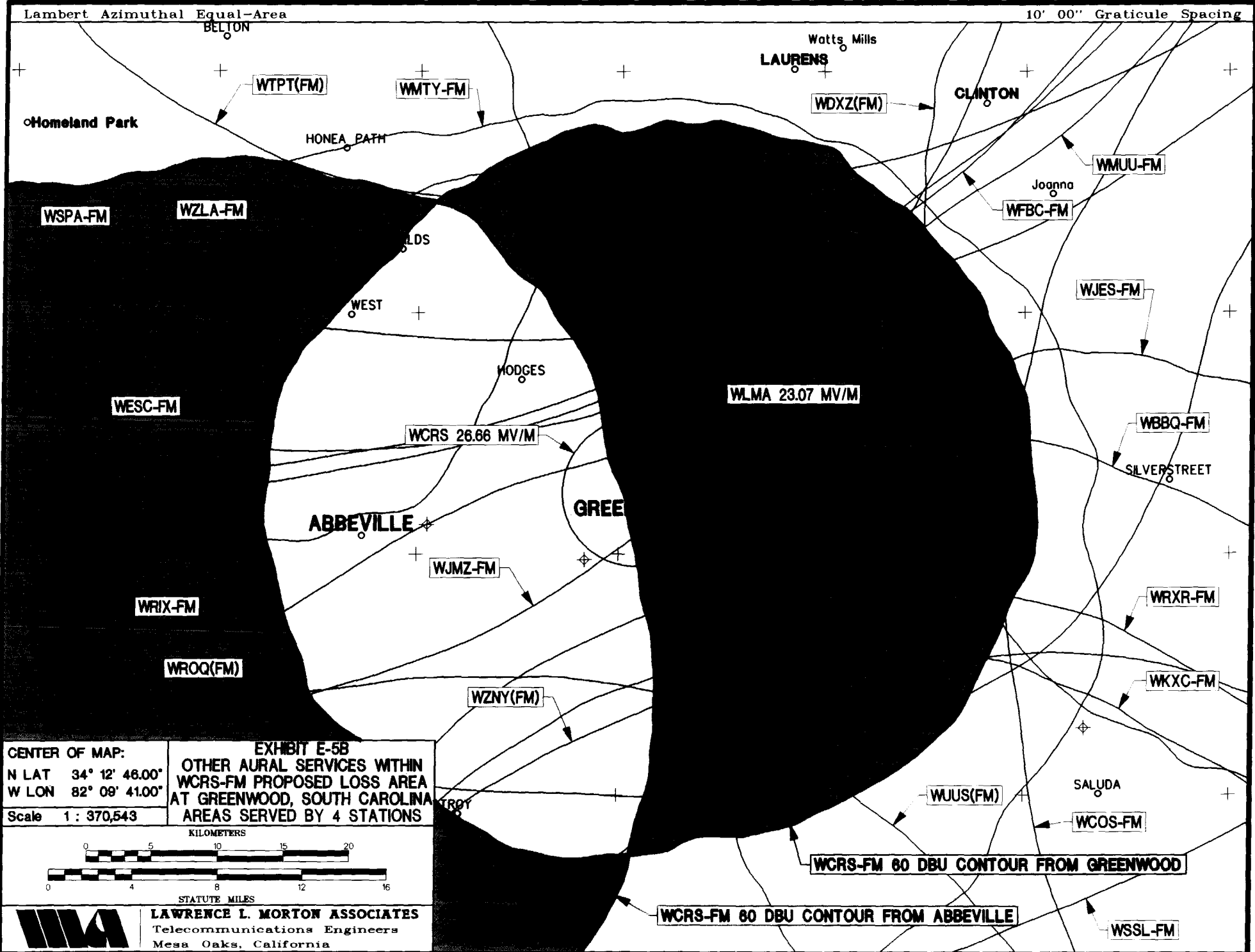
OTHER AURAL BROADCAST SERVICES
WITHIN WCRS-FM PROPOSED GAIN AREA
AT ABBEVILLE, SOUTH CAROLINA



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

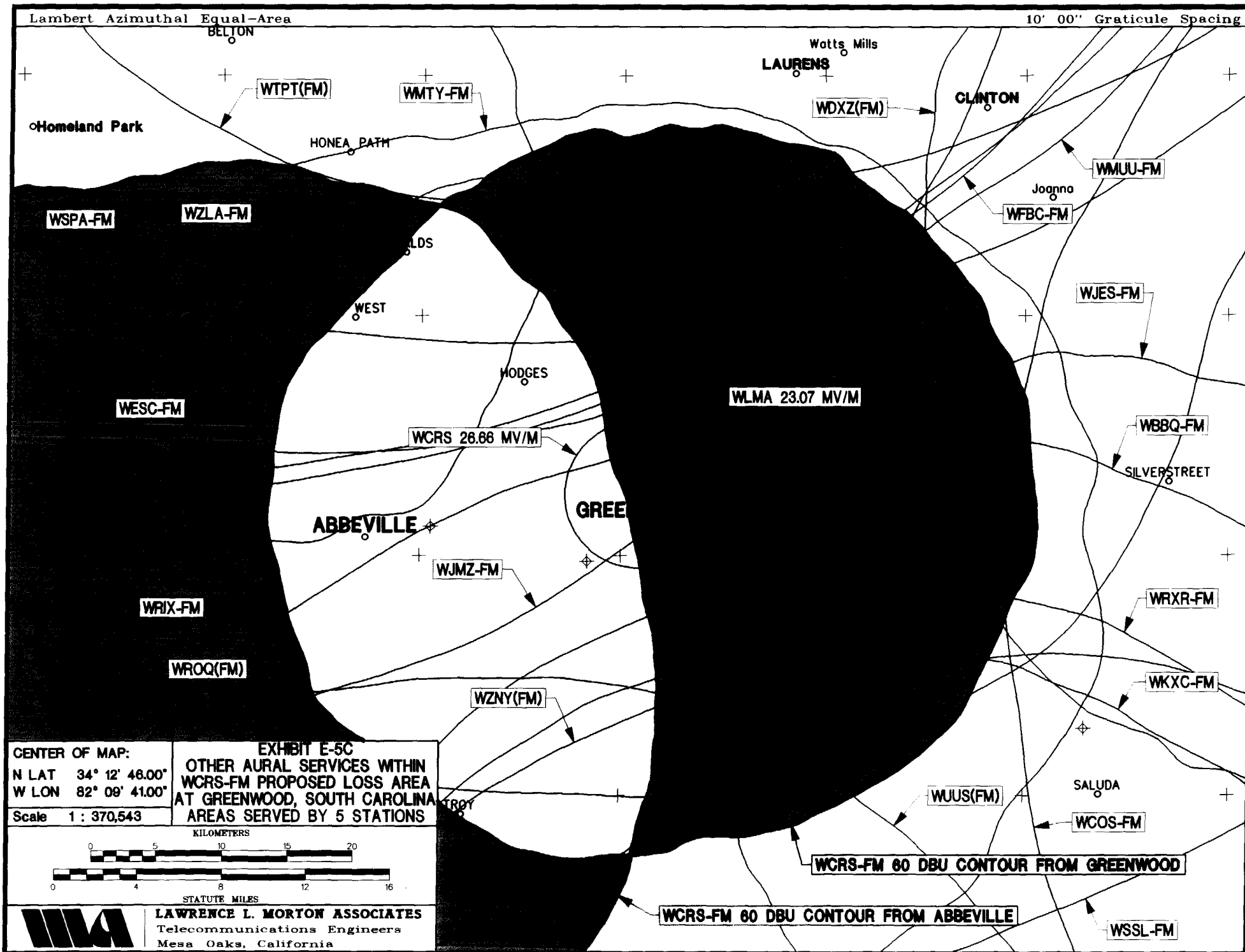






Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing



CENTER OF MAP:

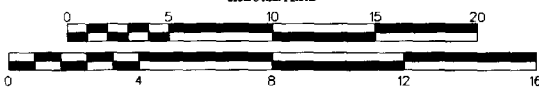
N LAT 34° 12' 46.00"
W LON 82° 09' 41.00"

Scale 1 : 370,543

EXHIBIT E-5C

OTHER AURAL SERVICES WITHIN
WCRS-FM PROPOSED LOSS AREA
AT GREENWOOD, SOUTH CAROLINA
AREAS SERVED BY 5 STATIONS

KILOMETERS



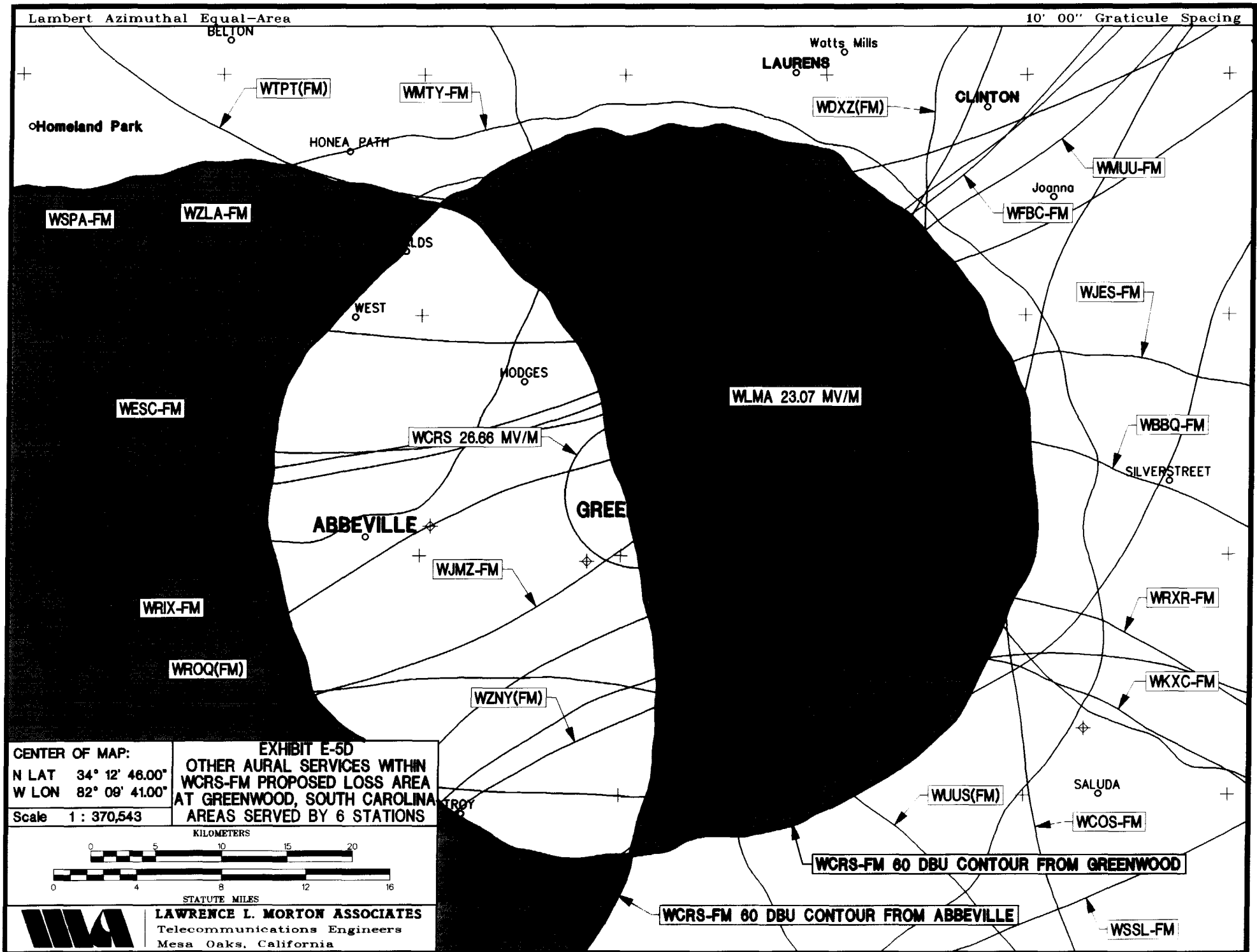
STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

Lambert Azimuthal Equal-Area
BELTON

10' 00" Graticule Spacing

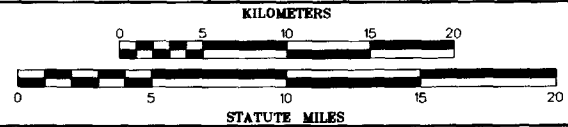


Lambert Azimuthal Equal-Area

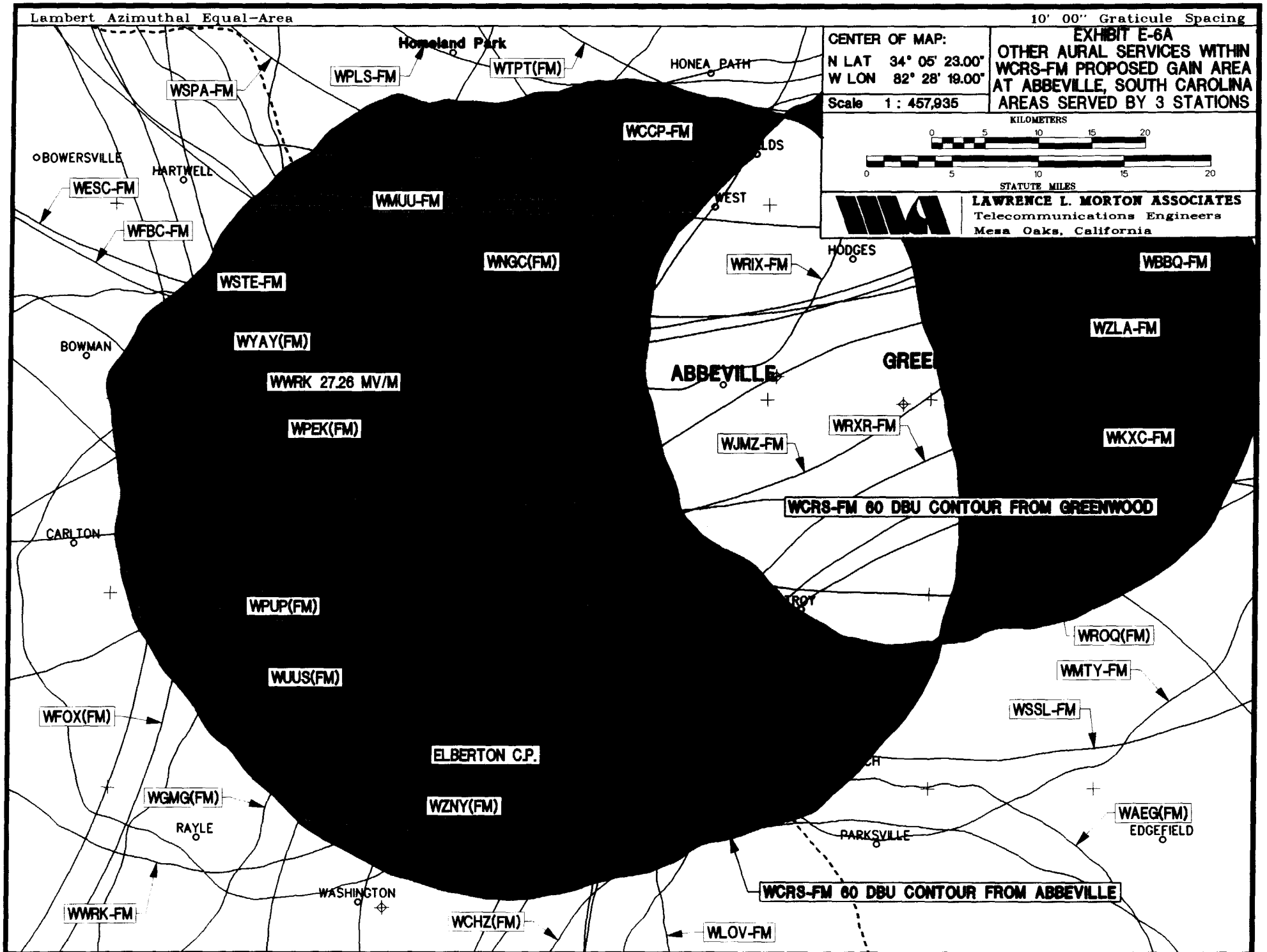
10' 00" Graticule Spacing

CENTER OF MAP:
N LAT 34° 05' 23.00"
W LON 82° 28' 19.00"
Scale 1 : 457,935

EXHIBIT E-6A
OTHER AURAL SERVICES WITHIN
WCRS-FM PROPOSED GAIN AREA
AT ABBEVILLE, SOUTH CAROLINA
AREAS SERVED BY 3 STATIONS



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California



10' 00" Graticule Spacing

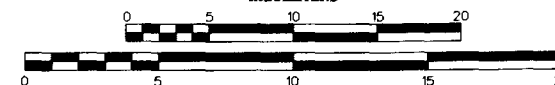
EXHIBIT E-6B

OTHER AURAL SERVICES WITHIN
WCBS-FM PROPOSED GAIN AREA
AT ABBEVILLE, SOUTH CAROLINA
AREAS SERVED BY 4 STATIONS

AT ABBEVILLE, SOUTH CAROLINA
AREAS SERVED BY 4 STATIONS

Scale 1 : 457,935

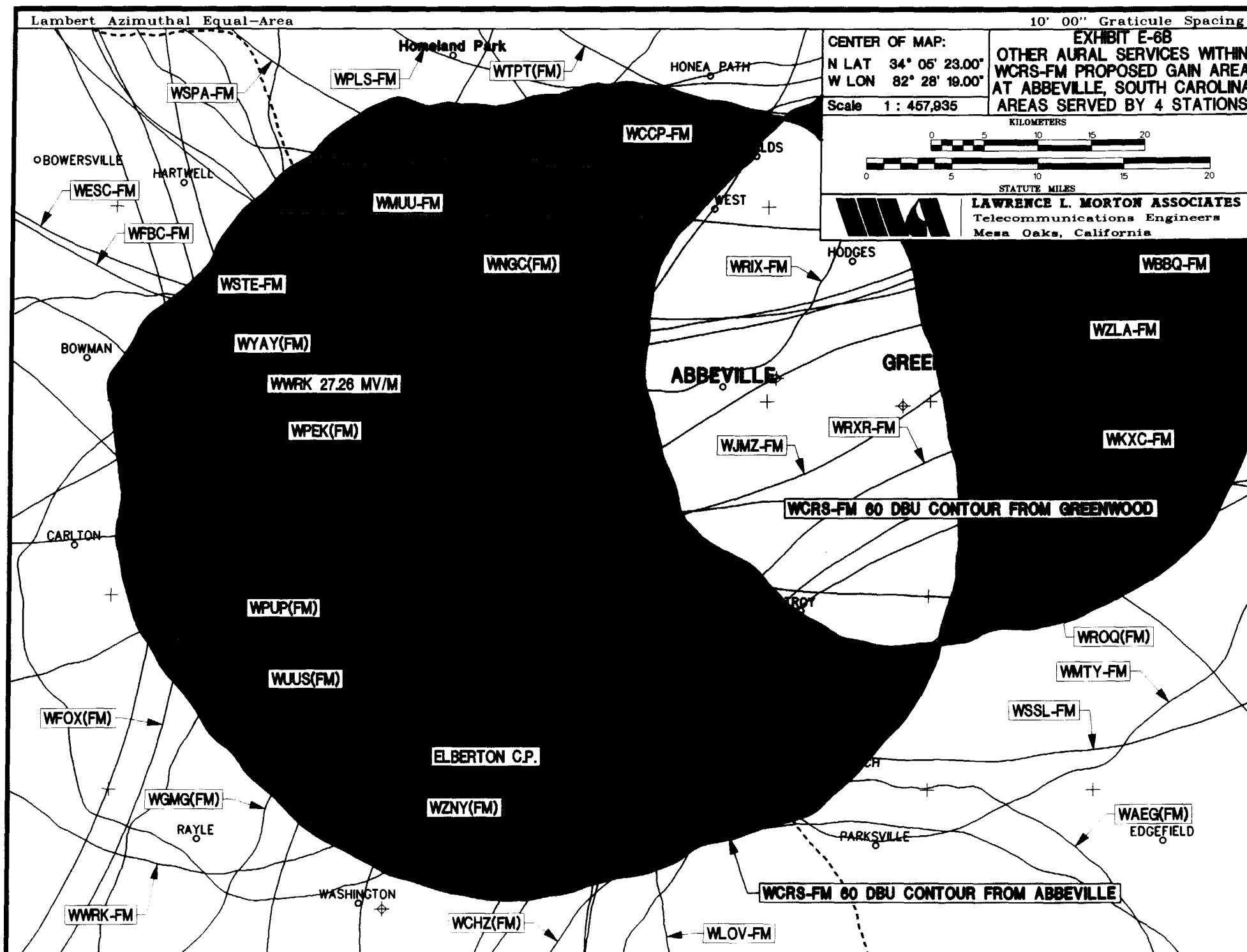
KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California



Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing

CENTER OF MAP:

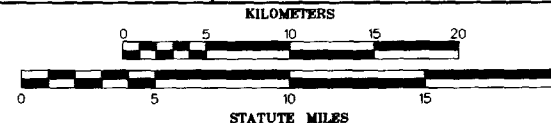
N LAT 34° 05' 23.00"

W LON 82° 28' 19.00"

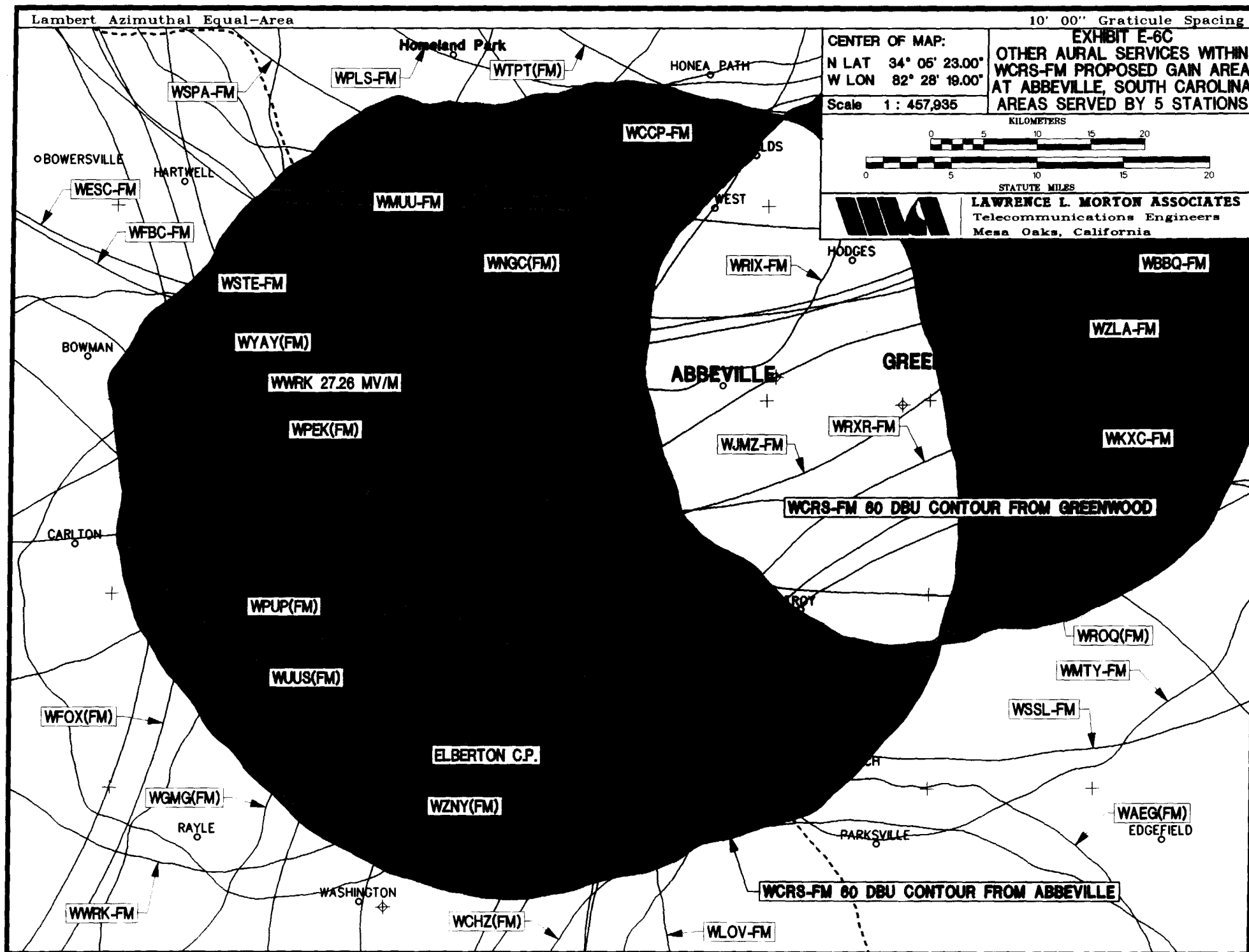
Scale 1 : 457,935

EXHIBIT E-6C

OTHER AURAL SERVICES WITHIN
WCRS-FM PROPOSED GAIN AREA
AT ABBEVILLE, SOUTH CAROLINA
AREAS SERVED BY 5 STATIONS



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California



Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing

CENTER OF MAP:

N LAT 34° 05' 23.00"

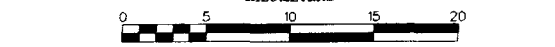
W LON 82° 28' 19.00"

Scale 1 : 457,935

EXHIBIT E-6D

OTHER AURAL SERVICES WITHIN
WCRS-FM PROPOSED GAIN AREA
AT ABBEVILLE, SOUTH CAROLINA
AREAS SERVED BY 6 STATIONS

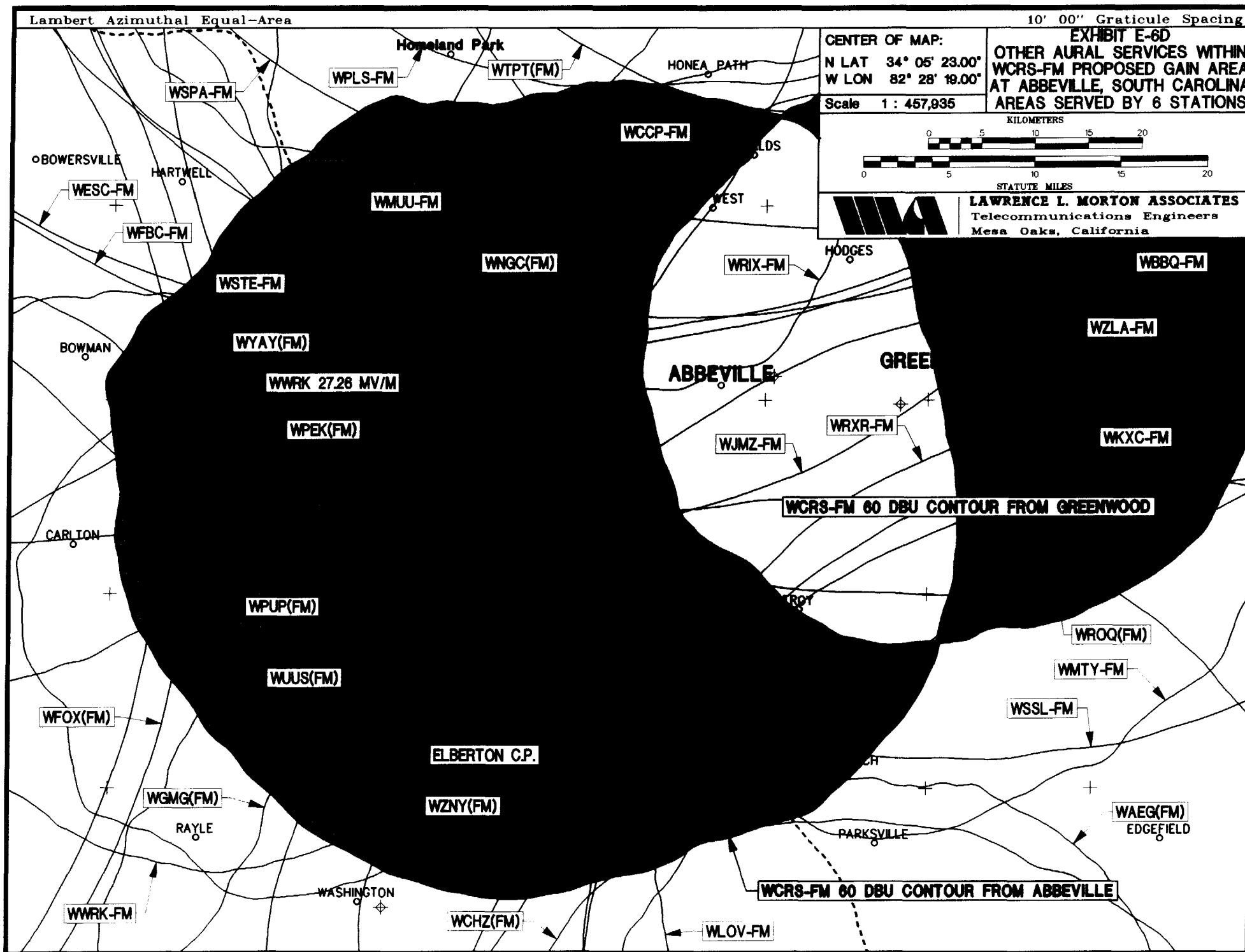
KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California



Lambert Azimuthal Equal-Area

10' 00" Graticule Spacing

CENTER OF MAP:

N LAT 34° 05' 23.00"

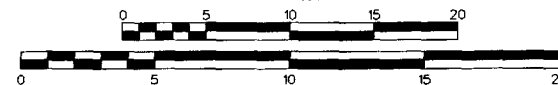
W LON 82° 28' 19.00"

Scale 1 : 457,935

EXHIBIT E-6E

OTHER AURAL SERVICES WITHIN
WCRS-FM PROPOSED GAIN AREA
AT ABBEVILLE, SOUTH CAROLINA
AREAS SERVED BY 7+ STATIONS

KILOMETERS



STATUTE MILES



LAWRENCE L. MORTON ASSOCIATES
Telecommunications Engineers
Mesa Oaks, California

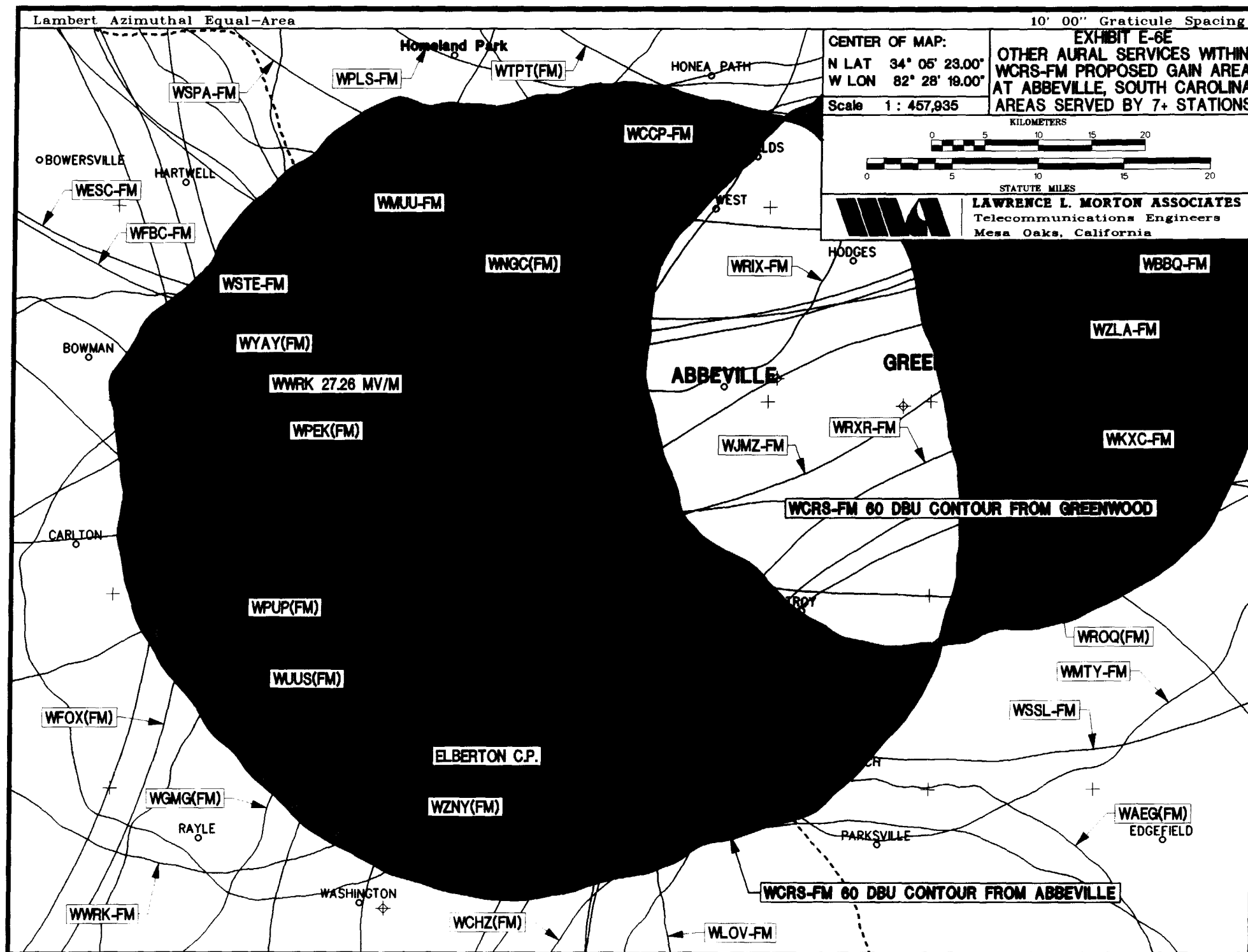


EXHIBIT E-7
OTHER AURAL BROADCAST SERVICES WITHIN WCRS-FM
PROPOSED LOSS AREA AT GREENWOOD

Sutton Radiocasting Corporation
August 1997

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF LOSS AREA	1990 CENSUS POPULATION	% OF LOSS AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	0.00	0.00	0.00	0	0.00
3	75.04	28.97	4.99	980	2.07
4	132.17	51.03	8.78	2,018	4.25
5	291.04	112.37	19.34	9,846	20.76
6	233.86	90.29	15.54	9,490	20.01
7	151.03	58.31	10.04	8,048	16.97
8	320.71	123.83	21.31	9,551	20.13
9	257.45	99.40	17.11	3,712	7.83
10	34.95	13.50	2.32	3,200	6.75
11	8.48	3.27	0.56	592	1.25
12	0.00	0.00	0.00	0	0.00
13	0.00	0.00	0.00	0	0.00
14	0.00	0.00	0.00	0	0.00
15	0.00	0.00	0.00	0	0.00
16	0.00	0.00	0.00	0	0.00
17	0.00	0.00	0.00	0	0.00
18	0.00	0.00	0.00	0	0.00
19	0.00	0.00	0.00	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	1,504.73	580.98	100.0 %	47,437	100.0 %

EXHIBIT E-8
OTHER AURAL BROADCAST SERVICES WITHIN WCRS-FM
PROPOSED GAIN AREA AT ABBEVILLE

Sutton Radiocasting Corporation
August 1997

NUMBER OF STATIONS SERVING THIS AREA	LAND AREA			POPULATION	
	SQUARE KILOMETERS	SQUARE MILES	% OF LOSS AREA	1990 CENSUS POPULATION	% OF LOSS AREA
0	0.00	0.00	0.00	0	0.00
1	0.00	0.00	0.00	0	0.00
2	0.07	0.03	0.00	0	0.00
3	167.38	64.63	4.38	1,338	2.61
4	444.31	171.55	11.62	2,433	4.74
5	769.77	297.21	20.13	5,502	10.72
6	665.79	257.06	17.41	5,987	11.66
7	494.54	190.94	12.93	6,491	12.64
8	430.71	166.30	11.26	13,185	25.69
9	269.09	103.90	7.04	6,378	12.42
10	331.04	127.82	8.66	4,802	9.35
11	228.79	88.34	5.98	4,789	9.33
12	23.03	8.89	0.60	428	0.83
13	0.00	0.00	0.00	0	0.00
14	0.00	0.00	0.00	0	0.00
15	0.00	0.00	0.00	0	0.00
16	0.00	0.00	0.00	0	0.00
17	0.00	0.00	0.00	0	0.00
18	0.00	0.00	0.00	0	0.00
19	0.00	0.00	0.00	0	0.00
20	0.00	0.00	0.00	0	0.00
21	0.00	0.00	0.00	0	0.00
22	0.00	0.00	0.00	0	0.00
23	0.00	0.00	0.00	0	0.00
24	0.00	0.00	0.00	0	0.00
25+	0.00	0.00	0.00	0	0.00
TOTALS:	3,824.52	1,476.66	100.0 %	51,333	100.0 %

EXHIBIT E-9
STATIONS PROVIDING OTHER AURAL BROADCAST SERVICES
WITHIN WCRS-FM PROPOSED LOSS AREA

Sutton Radiocasting Corporation
August 1997

NUMBER	CALL LETTERS	CITY	STATE	FREQUENCY
1	WJES-FM	SALUDA	SC	92.1 MHz
2	WESC-FM	GREENVILLE	SC	92.5
3	WZLA-FM	ABBEVILLE	SC	92.9
4	WTPT	FOREST CITY	NC	93.3
5	WFBC-FM	GREENVILLE	SC	93.7
6	WMUU-FM	GREENVILLE	SC	94.5
7	WRXR-FM	AIKEN	SC	96.3
8	WCOS-FM	COLUMBIA	SC	97.5
9	WSPA-FM	SPARTANBURG	SC	98.9
10	WKXC-FM	AIKEN	SC	99.5
11	WSSL-FM	GRAY COURT	SC	100.5
12	WROQ	ANDERSON	SC	101.1
13	WRIX-FM	HONEA PATH	SC	103.1
14	WMTY-FM	GREENWOOD	SC	103.5
15	WBBQ-FM	AUGUSTA	GA	104.3
16	WZNY	AUGUSTA	GA	105.7
17	WDXZ	NEWBERRY	SC	106.3
18	WJMZ-FM	ANDERSON	SC	107.3
19	WUUS	MARTINEZ	GA	107.7
20	WLMA	GREENWOOD	SC	1350. kHz
21	WCRS	GREENWOOD	SC	1450